



Johns Manville

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Via Facsimile

April 3, 1998

Kris Vezner, Assistant Regional Counsel
U.S. Environmental Protection Agency Region V
Mail Code C-14J
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: *Characterization Plan for Additional Sites; Waukegan, Illinois*

Dear Mr. Vezner:

Enclosed is Johns Manville International's (JM) **Characterization Plan for Additional Sites** (Plan) submitted in response to the US EPA Region V request dated March 20, 1998. A copy of the Region's request is also enclosed for your convenience. After studying the conditions related to the sites we believe the Plan proposes characterization activities which are appropriate given JM's limited involvement at these Additional Sites and the presumptive remedial action.

The Plan is submitted with JM's complete reservation of all rights and defenses, including, without limitation, those set forth in the Global CERCLA Settlement with the United States. *See, Stipulation and Order of Dismissal and Settlement* entered as an order of the Court on October 28, 1994 in *Manville Corp. et al. v. United States of America*, United States District Court for the Southern District of New York (91 Civ. 6683 [RWS]).

If you have any questions concerning this matter, please do not hesitate to call me.

Sincerely,



Bruce D. Ray
Senior Environmental Counsel

Kris Vezner, Assistant Regional Counsel

April 3, 1998

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enclosure

cc: Beth Wallace, Esq., Illinois Attorney General's Office
Stan Yonkausk, Esq., Illinois DNR
Bob Rogers, Illinois EPA
Steve Davis, Illinois DNR

Characterization Plan for Additional Sites

Waukegan, Illinois

Submitted by *Johns Manville International, Inc.*
to US EPA Region V

April 3, 1998

Site 1 - Northern Extension of Sand Street

Site Description

The area designated by the US EPA Region V as Site 1 is a road right-of-way that extends into the southwestern portion of the ILDNR nature preserve. This right-of-way is oriented southwest to northeast, extends from the northern boundary of the Johns Manville (JM) property line in a northeasterly direction for a distance of approximately 600 feet, and is approximately 20 feet wide. Based on a preliminary review of aerial photos and drawings, this feature appears to be an extension of Sand Street, a public road that passed northward along the western boundary of the main parking lot of the JM site.

Study Plan Objective

To characterize surficial conditions along and adjacent to Site 1 so that the extent of asbestos containing materials (ACM) is determined. The results of this proposed study plan will be summarized in a report that will be used to evaluate site conditions. As more fully discussed below, concurrent with locating and marking the location of ACM fragments, JM personnel or JM contractor personnel will remove all visible ACM fragments, wrap them in polyurethane bags and arrange for proper disposal. This will be done to minimize disturbance of surface soil in the nature preserve (as required by State Agencies), and to expedite the removal of these fragments from ILDNR property.

Proposed Study Plan

The proposed elements of JM's study plan for Site 1 are listed below. A project Health and Safety Plan will be transmitted to the U.S. Environmental Protection Agency (USEPA) following approval of this proposed study plan, and prior to the commencement of field work.

Task 1 - Measure the Dimensions of Site 1.

The compass orientation, and length and width of Site 1 will be measured by JM personnel, or contractors hired by JM. This information will be used to update current baseline topographic features available on site specific topographic drawings and aerial photos.

The results of this task will be a revised topographic drawing depicting Site 1.

Task 2 - Obtain Necessary Permits to Burn Vegetative Cover.

In order to complete a thorough visual inspection of the conditions on and adjacent to Site 1, it will be necessary to remove vegetative cover by burning. The Illinois Environmental Protection Agency (IEPA) requires an air permit for this activity. JM will prepare and transmit to IEPA the necessary application documents. Alternatively, the Illinois DNR will accomplish this task.

The results of this task will be an approved open burning permit to clear vegetative cover from the area on top of and no further than five feet outward from the toe of the side slope of the roadway at Site 1.

Task 3 - Remove Vegetative Cover from Site 1.

Conduct a controlled burning operation to remove grasses and shrubs so that an unobscured visual inspection of Site 1 can be made. Fire control measures normally used by ILDNR at other DNR property will be used to limit the extent of the burning to no more than 5 feet outward from the toe of the side slope of the roadway at Site 1. This open burning activity will be conducted by JM personnel under the supervision of ILDNR personnel. Prior to conducting this task, JM and ILDNR representatives must reach a written agreement as to the respective responsibilities and liabilities of each party during the implementation of this task. Alternatively, the Illinois DNR will accomplish this task.

The results of this task will be an unobscured surface to allow a visual inspection of Site 1.

Task 4 - Locate, Mark and Remove All Surficial ACM.

JM personnel or JM contractor personnel will carefully inspect the surface of Site 1 to locate and mark the location of all ACM fragments in Site 1. The location of each ACM fragment will be marked with a wire mounted survey flag, and each location will be determined using global positioning satellite (GPS) equipment. After marking and measuring ACM fragment locations, all ACM fragments will be carefully removed and deposited into polyurethane bags for proper disposal.

The locations of all ACM fragments will be indicated on the topographic drawing prepared during Task 1.

The results of this task will be that all ACM fragments found during the surface inspection will be noted on the project drawing as to location, and all fragments will be carefully removed from Site 1 and properly disposed.

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Task 5 - Prepare Site 1 Report.

A written report summarizing the tasks and results of all work undertaken at Site 1 will be prepared by JM and distributed to ILDNR, IEPA, the Office of the Illinois Attorney General (IAG), and to the U.S. Environmental Protection Agency (USEPA). This report will be used to evaluate site conditions.

The results of this task will be a written report summarizing all work undertaken at Site 1.

Task 6 - Meet with Agency Representatives to Evaluate Site 1 Remediation Options.

After each party has had the opportunity to review the Site 1 report, a meeting will be convened to evaluate site conditions.

The results of this task will be an agreement among all parties regarding an action plan for Site 1.

Site 2 - Former Pan Am Games Shooting Range

Site Description

The area designated by the US EPA Region V as Site 2 is an area located south of the JM site boundary. This area is oriented east to west, extends from the southern boundary of the Johns Manville property line in a southerly direction for a distance of approximately 200 feet, and from the Lake Michigan shoreline approximately 1,000 feet in a westerly direction.

Study Plan Objective

To define the areal extent of surficial asbestos containing materials (ACM) in the area designated as Site 2. The results of this proposed study plan will be summarized in a report that will be used to evaluate site conditions. As more fully discussed below, concurrent with locating and marking the location of ACM fragments, JM personnel or JM contractor personnel will remove all visible ACM fragments, wrap them in polyurethane bags and arrange for proper disposal of all ACM fragments. This will be done to minimize delays in the removal of this material from areas accessible to the public.

In addition, the assumption underlying this proposed approach is that capping ACM remaining below the ground surface is preferable to excavation, and off-site transport and disposal. Accordingly, significant subsurface characterization is not included in this plan.

Vertical,
no
detail
(grid, etc)
grid in
trenches
at least
- need limit
on investig
activities
+ access
- ask Kevin
probably
should
not require
period (30 days)
to wrap up
investig +
start sampling
not
true

Proposed Study Plan

The proposed elements of JM's study plan for Site 2 are listed below. A project Health and Safety Plan will be transmitted to the U.S. Environmental Protection Agency (USEPA) following approval of this proposed study plan, and prior to the commencement of field work.

Task 1 - Determine Ownership of Area At and Adjacent to Site 2

Using Lake County records, current and past property ownership will be established. JM will secure access to the property - with the assistance of US EPA as may be required.

The results of this task will be an understanding of current and past property ownership at and adjacent to the area designated as Site 2. This information will be added to the project drawing prepared as part of Task 3.

Task 2 - Determine Shooting Range Construction and Demolition Features and History.

JM will contact all known persons who participated in the construction, operation and demolition of the shooting range during and after the Pan Am Games in 1959, as owner, operator or contractor. Carefully documented interviews with each of these persons will be conducted to determine, at a minimum, the following: how and when the range was constructed; the availability of design documents; area dimensions; location of pits, buildings, berms and other features; how and when the facility was operated as the Waukegan Shoot-O-Rama, Inc.; how, by whom and when the shooting range was demolished; and any other information that will assist with site location and characterization. These interviews will be conducted in a manner and with the participation of those agency personnel designated by USEPA.

The results of this task will be a better understanding of the shooting range configuration during and after the Pan Am Games, and the configuration of the area following demolition. This information will be used to define site characterization tasks.

Task 3 - Measure the Dimensions of Site 2

The length and width of Site 2 will be determined by JM personnel, or contractors hired by JM. This will be done using the results of interviews of those persons who participated in the construction and demolition of the shooting range, and soil sampling, as described below. This information will be used to update site specific topographic drawings and aerial photos.

The results of this task will be a revised topographic drawing depicting Site 2.

Task 4 - Proposed Soil Sampling Plan

JM personnel or JM contractor personnel will conduct sampling of the surface and subsurface soils at Site 2. This sampling plan will be refined following the interviews conducted as part of Task 2, but will include the following element:

* After burning the surface vegetative cover, ACM fragments found on the surface of Site 2 will be located, marked and removed. The location of each ACM fragment will be marked with a wire mounted survey flag, and each location will be determined using global positioning satellite (GPS) equipment. After marking and measuring ACM fragment locations, all ACM fragments will be removed and deposited into polyurethane bags for proper disposal. The locations of all ACM fragments will be indicated on the topographic drawing prepared during Task 3.

The results of this task will be a more precise definition of the areal extent of ACM, which will be depicted on the Site 2 drawing. This information will be used to evaluate Site 2 conditions.

Task 5 - Prepare Site 2 Report

A written report summarizing the tasks and results of all work undertaken at Site 2 will be prepared by JM and distributed to ILDNR, IEPA, the Office of the Illinois Attorney General (IAG), and to USEPA. This report will be used to evaluate site conditions.

The results of this task will be a written report summarizing all work undertaken at Site 2.

Task 6 - Meet with Agency Representatives to Evaluate Site 2 Remediation Options.

After each party has had the opportunity to review the Site 2 report, a meeting will be convened to evaluate site conditions.

The results of this task will be an agreement among all parties regarding an action plan for Site 2.

Site 3 - Former JM Parking Area Located South of Greenwood Ave.

Site Description

The area designated as Site 3 is an area of approximately 40,000 square feet, and is located on Commonwealth Edison property south of Greenwood Avenue and aligned with the west end of JM former Administrative Building at the southern end of the JM property. This area is approximately 200 feet on each side, and extends from the southern boundary of Greenwood Ave. in a southerly direction for a distance of approximately 200.

need
vertical
+ need limit
on length
of investig.
+ access

Study Plan Objective

To define the areal extent of asbestos containing materials (ACM) in the area designated as Site 3. The results of this proposed study plan will be summarized in a report that will be used to evaluate site conditions.

In addition, the assumption underlying this proposed approach is that capping ACM remaining below the ground surface is preferable to excavation, and off-site transport and disposal. Accordingly, significant subsurface characterization is not included in this plan.

Proposed Study Plan

The proposed elements of JM's study plan for Site 3 are listed below. A project Health and Safety Plan will be transmitted to the U.S. Environmental Protection Agency (USEPA) following approval of this proposed study plan, and prior to the commencement of field work..

Task 1 - Determine Ownership of Area At and Adjacent to Site 3

Using Lake County records, current and past property ownership will be established. JM will secure access to the property - with the assistance of US EPA as may be required.

The results of this task will be an understanding of current and past property ownership at and adjacent to the area designated as Site 3. This information will be added to the project drawing prepared as part of Task 3.

Task 2 - Determine Parking Lot Construction and Demolition Features and History.

JM will contact all known persons who participated in the construction, use and demolition of the parking lot. Carefully documented interviews with each of these persons will be conducted to determine, at a minimum, the following: how and when the parking lot was constructed; the availability of design documents; area dimensions; how, by whom and when the parking lot was demolished; and any other information that will assist with site location and characterization. These interviews will be conducted in a manner and with the participation of those agency personnel designated by USEPA.

The results of this task will be a better understanding of the parking lot configuration. This information will be used to define site characterization tasks.

Task 3 - Measure the Dimensions of Site 3

The length and width of Site 3 will be determined by JM personnel, or contractors hired by JM. This will be done using the results of interviews of those persons who participated in the construction and demolition of the parking lot, and soil sampling, as described below. This information will be used to update site specific topographic drawings and aerial photos. The results of this task will be a revised topographic drawing depicting Site 3 that will be used by all parties for an evaluation of site conditions.

Task 4 - Proposed Soil Sampling Plan

JM personnel or JM contractor personnel will conduct sampling of the surface and subsurface soils at Site 3. This sampling plan will be refined following the interviews conducted as part of Task 2, but will include the following element:

* After securing all necessary permits to do so, JM will conduct a burning the surface vegetative cover. ACM fragments found on the surface of Site 3 will be located, marked and removed. The location of each ACM fragment will be marked with a wire mounted survey flag, and each location will be determined using global positioning satellite (GPS) equipment. After marking and measuring ACM fragment locations, all ACM fragments will be removed and deposited into polyurethane bags for proper disposal. The locations of all ACM fragments will be indicated on the topographic drawing prepared during Task 3.

The results of this task will be a more precise definition of the areal extent of ACM, which will be depicted on the Site 3 drawing. This information will be used to evaluate Site 3 conditions.

Task 5 - Prepare Site 3 Report

A written report summarizing the tasks and results of all work undertaken at Site 3 will be prepared by JM and distributed to ILDNR, IEPA, IAG, and to USEPA. This report will be used to evaluate site conditions.

The results of this task will be a written report summarizing all work undertaken at Site 3.

Task 6 - Meet with Agency Representatives to Evaluate Site 3 Remediation Options

After each party has had the opportunity to review the Site 3 report, a meeting will be convened to site conditions.

The results of this task will be an agreement among all parties regarding an action plan for Site 3.

- suggest 30 day limit for access, burning, interviews, etc.
- need schedule
- need to list labs + type of test for confirming AB
- need to map, if possible, + show locations of samples